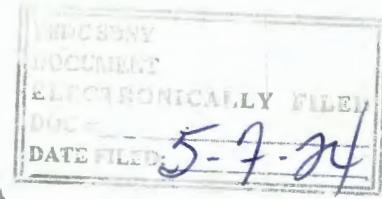


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VIA CM/ECF FILING

May 3, 2024

The Honorable Lewis A. Kaplan
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: S.G., et al. v. Bank of China Ltd., et al.
No. 1:23-cv-2866**

Dear Judge Kaplan,

Plaintiffs respectfully file this letter to provide the status of service of process on Defendant Bank of China Ltd. (“BOC”). As set forth in details below, Plaintiff respectfully requests the Court’s leave to amend the Complaint (Dkt. No. 1) in order to complete the service on Defendant BOC.

By all means Plaintiffs have commenced the service on two foreign Defendants, BOC and BOC International Holdings Ltd. (“BOCI”), under Hague Convention without any delay, exemplified by the completion of service on Defendant BOCI in December, 2023.¹ However, as for Defendant BOC, the Ministry of Justice of People’s Republic of China has declined the

¹ Plaintiffs have not received the proof of service on Defendant BOCI, but its counsel has entered appearance in December, 2023.

request for service over semantics. It requests the full name Hong Kong SAR of China be used whenever referencing to Hong Kong. *See Ex. 1 Letter from Ministry of Justice, P.R. China.* Although dated November 21, 2023, the letter did not reach our office until April 9, 2024. Thereafter, Plaintiffs reached out to Defendants counsel for their consent to amend the Complaint pursuant to Fed.R.Civ.P. 15. *See Ex. 2 Email Exchanges between Counsel.* But no consent was given by April 29, 2024 when the Court dismissed the claims against all Defendants except for Defendant BOC ("Order") (Dkt. No. 67). Now this issue is moot given the dismissal of all Defendants who have appeared in this action.

In order to complete the service on Defendant BOC, Plaintiff respectfully request the Court's leave to amend the Complaint pursuant to Rule 15. The proposed amended Complaint and the redlined version are annexed hereto as Exhibit 3.

With all due respect, Plaintiffs also renew their request to remain anonymous until the Court orders otherwise.

Thank you very much.

Respectfully,

/s/ John Y. Tang
John Y. Tang
Counsel for Plaintiffs

Cc: All counsel of record (via CM/ECF filing).

*Granted.. In
so ruling, the Court does
not pass on the sufficiency
of the amended complaint.*

SO ORDERED

LEWIS A. KAPLAN, USDJ

5/7/24